Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Avenue 3 South Pasadena, CA 91030-3227 Tel: 626-799-9797 Fax: 626-799-9795 TPRLAW@att.net **Attorneys for Plaintiff** Joe Hand Promotions, Inc. **Thomas Rich McInnis** 8 101 Esplanade 9 Aptos, CA 95003 Defendant, Pro Se 10 11 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 12 SAN JOSE DIVISION 13 JOE HAND PROMOTIONS, INC., Case No. 5:10-cv-01614-LHK 14 Plaintiff, STIPULATION OF PLAINTIFF JOE 15 HAND PROMOTIONS, INC. AND 16 **DEFENDANT THOMAS RICH** v. McINNIS STIPULATION TO EXTEND 17 THOMAS RICH McINNIS, et al. THE ADR DEADLINE; AND ORDER 18 (Proposed) Defendant. 19 20 TO THE HONORABLE LUCY H. KOH, THE PARTIES, AND THEIR 21 ATTORNEY/S OF RECORD: 22 By and through their counsel, Plaintiff Joe Hand Promotions, Inc., and Defendant Thomas Rich 23 McInnis, hereby agree, stipulate, and respectfully request that this Honorable Court extend the ADR 24 deadline in the instant action from February 28, 2011 to April 7, 2011 pursuant to ADR Local Rule 6-25 5¹. 26 ¹ Plaintiff's counsel and defendant Thomas Rich McInnis sincerely apologize that this Stipulation is filed late and not 27 fourteen (14) days or more beyond the presently scheduled ADR deadline of February 28, 2011. Due to difficulties in Plaintiff's counsel reaching defendant McInnis and Mr. McInnis reaching Plaintiff's counsel throughout the month of February 2011, their participation in the pre mediation teleconference with Court appointed mediator Vicki Veenker was delayed, which in turn delayed preparation and filing of this Stipulation.

STIPULATION OF PLAINTIFF JOE HAND PROMOTIONS, INC. AND DEFENDANT THOMAS RICH MCINNIS STIPULATION TO EXTEND THE ADR DEADLINE; AND ORDER (Proposed)
CASE NO. 5:10-cv-01614-LHK

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1	1. This request is necess	ary because, due to scheduling conflicts of defendant Thomas
2	Rich McInnis and Plaintiff's counsel Thomas P. Riley, the Parties were unable to concur with Court	
3	appointed mediator Vicki Veenker until Wednesday, February 23, 2011. In this telephonic	
4	conference however, defendant Thomas Rich McInnis, Plaintiff's counsel, and mediator Veenker	
5	were able to conduct a meaningful discussions towards settlement and the procedures to be followed	
6	at the Court ordered mediation. In the teleconference the participants were further able to clear the	
7	date of Thursday, April 7, 2011 as the first mutually convenient date to conduct the mediation.	
8	2. Court appointed mediator Vicki Veenker interposes no objection to the extension of	
9	the present ADR deadline from February 28, 2011 to and through April 7, 2011.	
10	WHEREFORE, IT IS HEREBY STIPULATED BY AND RESPECTFULLY REQUESTED	
11	BY THE PARTIES that the Court continue the deadline to conduct the ADR from February 28, 2011 to	
12	and through Thursday, April 7, 2011.	
13		
14		Respectfully submitted,
15		
16	Dated: February 25, 2011	/s/ Thomas P. Riley LAW OFFICES OF THOMAS P. RILEY, P.C.
17		By: Thomas P. Riley
18		Attorneys for Plaintiff Joe Hand Promotions, Inc.
19		Joe Hand Homotions, me.
20		
21		
22	Dated: February 25, 2011	/s/ Thomas Rich McInnis Thomas Rich McInnis
23		Defendant
24		
25	///	
26	/// 	
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28		

ORDER (Proposed) 1 IT IS HEREBY ORDERED that the ADR deadline in civil action 5:10-cv-01614-LHK styled 2 Joe Hand Promotions, Inc. v. Thomas Rich McInnis, et al. is hereby continued from February 28, 2011 3 to and through Thursday, April 7, 2011. 4 5 6 7 IT IS SO ORDERED: 8 9 March 4, 2011 10 Dated: THE HONORABLE LUCY H. KOH 11 **United States District Court** 12 **Northern District of California** 13 /// 14 /// 15 16 17 18 /// 19 /// 20 /// 21 /// 22 /// /// 23 /// 25 26 27 28